May 8, 2023

## **VIA ECF**

The Honorable Paul G. Gardephe, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Courtroom 705 New York, NY 10007

Re: Joint Letter in Tang v. Tang, No. 22 Civ. 5736 (PGG) (S.D.N.Y.)

Dear Judge Gardephe:

Plaintiff Vincent Tang and Defendant Wilson Tang respectfully submit this joint letter to update the Court on the status of this action, which is currently calendared for a conference this Thursday, May 11.

The parties have reached an agreement in principle to settle this action and are finalizing a termsheet setting forth the material terms of settlement. The parties expect the this termsheet will require the filing of a discontinuance of this action, with prejudice, within two business days of the execution of a long-form settlement agreement. The parties are hopeful that a long-form settlement agreement—as well as other needed agreements to effect the resolution of their dispute—can be drafted and finalized within approximately one to two months.

In light of these developments, the parties respectfully request that the Court adjourn the upcoming May 11 conference and require the parties to submit a joint letter on or before July 6 reporting on the status of their final settlement agreement.

Respectfully submitted,

Hon. Paul G. Gardephe Page 2

## CAHILL GORDON & REINDEL, LLP

## GIBSON, DUNN & CRUTCHER LLP

## By: /s/ Michael B. Weiss

Michael B. Weiss
Paul G. D. Morales
CAHILL GORDON & REINDEL LLP
32 Old Slip
New York, NY 10005
Telephone: 212-701-3000
mweiss@cahill.com
pgmorales@cahill.com

David Dong Ann Lin LEWIS & LIN, LLC 77 Sands Street, 6th Floor Brooklyn, NY 11201 Telephone: 718-243-9323 david@ilawco.com

Counsel for Plaintiff Vincent Tang

By: <u>/s/ Brian Ascher</u>

Orin Snyder
Brian C. Ascher
David P. Salant
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166
Telephone: 212.351.3989
OSnyder@gibsondunn.com
BAscher@gibsondunn.com
DSalant@gibsondunn.com

Counsel for Defendant Wilson Tang

cc: All Counsel of Record (via ECF)